

ATTACHMENT III-1

CONTAINER MANAGEMENT PLAN

1. SCOPE

This plan applies to waste received from off-site, and on-site waste that is managed in containers. On-site generated waste shall be managed by the Permittee in accordance with the applicable requirements for generators in UAC R315-5-3.34 until such waste is placed into permitted management.

2. DEFINITIONS

- a. The following are general classifications applied to waste managed at the Mixed Waste Facility: bulk waste and containerized waste.
- b. In this attachment, bulk waste shall be defined as solid-phase waste that arrives in dump trucks, rail cars, or other similar conveyances. Bulk waste shall be managed by:
 - i. transferring into storage containers, or
 - ii. routing directly to the Mixed Waste Landfill Cell, or
 - iii. unloading directly into the receiving tank, or
 - iv. other management in accordance with the applicable provisions of this Permit.
- c. The Mixed Waste Facility shall include all areas within the secured boundaries including the following:
 - i. Mixed Waste Treatment Building
 - ii. Mixed Waste Operations Building
 - iii. Mixed Waste Storage Building
 - iv. Mixed Waste Storage Areas
 - v. Mixed Waste Landfill Cell
- d. A container shall be defined as any portable device in which a waste material may be stored, transported, treated, disposed, or otherwise handled.

3. WASTE TRANSFER, CONTAINER STORAGE, AND TREATMENT IN CONTAINERS

- a. For purposes of receiving and managing wastes from off-site, there are four general phases of management:

- i. transit,
- ii. incoming shipment,
- iii. holding, and
- iv. storage / treatment / disposal.

b. Transit.

A shipment shall be considered in transit when, for rail shipments, it is on any rail line other than the Permittee's-operated spur; or for highway shipments, when it is not at the site. Shipments in transit shall be the responsibility of the transporter.

- i. The day that a rail shipment is pulled onto the Permittee's-operated spur shall be considered the date of arrival at the site.
- ii. The day that a highway shipment reaches the site during regular working hours on an operating day shall be considered the date of arrival at the site. Shipments that reach the site after regular working hours or on non-operating days shall be considered to be in transit until the Permittee can sign the manifest at the beginning of the next operating day.
- iii. Upon the development of any transporter/generator problems, the Permittee shall notify the Executive Secretary about the shipment, and the specific problem, before the end of the next business day and establish a schedule for management of the shipment.

c. Incoming Shipment.

The incoming-shipment phase shall begin on the day of arrival. For the incoming-shipment phase, rail cars and highway shipments that reach the site shall be under the control of the transporter until the Permittee signs the manifest. The incoming shipment phase may take several days or a few weeks, depending on the requirements of sampling and confirmation that shall be part of waste acceptance.

- i. For highway shipments, manifests shall be signed and dated by the Permittee acknowledging receipt of the hazardous waste from the transporter on the date of arrival prior to releasing the transporter from the site. If a discrepancy exists, it shall be resolved in accordance with the provisions in Attachment II-1, *Waste Analysis Plan*.
- ii. For rail shipments, manifests and/or shipping papers shall be signed and dated by the Permittee acknowledging receipt of the hazardous waste from the transporter on the day of delivery of the waste to the

Permittee's-operated spur. The incoming shipment phase may take several days or a few weeks, depending on the requirements of sampling and confirmation that shall be part of waste acceptance.

d. Holding.

Holding (held) shall be defined as management activities following acceptance and prior to initial placement into treatment, container storage or disposal management.

i. Containers of waste shall only be held in designated holding areas within the Mixed Waste Facility. Holding areas shall be prepared, hardened surfaces (e.g., concrete, asphalt-paved, asphalt fines) and shall not be designated as permitted waste storage areas. Holding areas shall be designated in Attachment II-11, *Facility Drawings*.

ii. Rail Cars.

A. Once the manifest is signed, waste received in rail cars shall be held on the Permittee's-operated spur for no more than ten days following the date of arrival. Prior to the end of this ten-day holding period, such waste shall be transferred to container storage, treatment or disposal management.

B. Waste for which off-site analysis is being conducted may continue to remain on the Permittee's-operated spur while analysis is being performed. Within five days of receipt of analytical results, the waste shall either be accepted for management and transferred out of the rail car or determined to be unacceptable.

C. Unacceptable wastes, which remain on the Permittee's-operated spur, shall be managed as follows:

1. Within five days of receipt of analytical results indicating the waste is unacceptable, additional samples shall be collected and sent for analysis.

2. Within fifteen days of receipt of the second analytical results indicating the waste is still unacceptable, the waste shall be returned to the generator or, forwarded to another licensed facility for proper management.

D. If an extension of the ten-day holding period shall be required, the Permittee shall request this extension from the Executive

Secretary, verbally or by telephone facsimile. The request shall be made prior to expiration of the ten day holding period and shall include the following:

1. tracking number,
2. rationale, and
3. requested extension.

iii. Highway Shipments.

- A. For highway shipments, waste may be held in designated holding areas within the Mixed Waste Facility in accordance with Attachment II-11, *Facility Drawings*. Waste shall be held for no more than ten days after the Permittee signs the manifest, within which time such waste shall be transferred to container storage, treatment, or disposal management.
- B. If an extension of the ten day holding period shall be required, the Permittee shall request this extension from the Executive Secretary, verbally or by telephone facsimile. The request shall be made prior to expiration of the ten day holding period and shall include the following:
 1. tracking number,
 2. rationale, and
 3. requested extension.

- iv. Waste containers shall be on pallets or runners during the holding period when outside of any transport vehicle.

e. Storage.

- i. Containers of waste shall only be stored in the Mixed Waste Storage Building, in the Mixed Waste Operations Building, on the Mixed Waste Storage Areas or in the Mixed Waste Treatment Building.
- ii. The rail and truck unloading docks may be used for waste holding but shall not be used for waste storage.
- iii. With the exception of Permittee generated liquid wastes in Section 3.e.iv of this plan, waste shall be treated in containers only in the Mixed Waste Storage Building, in the Mixed Waste Operations Building, or in the Mixed Waste Treatment Building and in accordance with the applicable

provisions for waste treatment in this permit.

- iv. Permittee generated liquid wastes may be solidified in containers at the site of generation and within secondary containment areas of the facility or as otherwise approved in writing by the Executive Secretary.
- v. The Permittee's mixed waste container storage areas shall consist of the following and are designated in Attachment II-11, *Facility Drawings*:
 - A. West Container Storage Area (west of Mixed Waste Disposal Cell Areas 1A/2A; not approved for use)
 - B. East Container Storage Area (east of Disposal Areas 1B/2B and east of the rail line)
 - C. Southeast Container Storage Area (south of the treatment building)
 - D. South Container Storage Area (east of the Mixed Waste Storage Building and west of the Mixed Waste Treatment Building)
 - E. Central Container Storage Area (immediately south of the Mixed Waste Landfill Cell and north of the south container storage area)
 - F. Mixed Waste Storage Building
 - G. Mixed Waste Treatment Building
 - H. Mixed Waste Operations Building
- vi. Containers in storage may be temporarily transferred to holding areas to carry out such activities as re-packaging, re-labeling, re-sampling, etc., and for purposes of area access. Such transfers shall be tracked in accordance with Attachment III-2, *Waste Identification and Tracking Plan* and such activities shall be completed and the containers shall be returned to storage areas within 48-hours unless additional time is approved in writing by the Executive Secretary. However, such transfers involving liquid waste shall be returned to secondarily-contained permitted storage areas by the end of that day. Such activities may also be carried out in the storage areas so long as other permit requirements (e.g., aisle space) are met.
- vii. Containers may also be transferred between storage areas, or between storage and treatment, or between storage and disposal. Such transfers

shall be tracked in accordance with Attachment III-2, *Waste Identification and Tracking Plan* and such activities shall be completed and the containers shall be returned to storage areas within 48-hours unless additional time is approved in writing by the Executive Secretary.

- viii. Transfers (e.g., re-packaging, overpacking) involving waste with a liquid phase shall be conducted in accordance with Attachment II-1-4, *Liquid Waste Management Plan*.
- ix. Loading and lid securing operations for MACRO Capsules may also take place on permitted storage pads or holding areas. The waste to be encapsulated within a MACRO Capsule shall be contained within a closed container such as compacted debris in an 85-gallon overpack drum.

4. INSPECTION OF CONTAINER MANAGEMENT AREAS, CONTAINER DECONTAMINATION, AND CONTAINER INCOMPATIBILITY SEGREGATION

- a. Container management areas shall be inspected to ensure that containers shall be properly stored, labeled and kept closed in accordance with Condition III.C.1, except when waste shall be added or removed.
- b. Container management shall include only the following areas:
 - i. The Mixed Waste Storage Building
 - ii. The Mixed Waste Operations Building
 - iii. The Mixed Waste Storage Areas
 - iv. The Mixed Waste Treatment Building
 - v. The holding areas
- c. The container management areas shall be inspected in accordance with Attachment II-3, *Site Inspection Plan*.
- d. Vehicles, equipment, and materials, including emptied reusable containers leaving the Mixed Waste Facility, shall be inspected and decontaminated according to the procedures outlined in Attachment II-1-6, *Leachate, Evaporation, and Decontamination Waste Management Plan*.
- e. Empty containers for reuse within the Mixed Waste Facility shall be inspected to ensure RCRA empty requirements prior to reuse.
- f. Radiological decontamination, if applicable, shall be performed in accordance with the Permittee's Radioactive Materials License.

- g. Wastes from different waste streams shall be managed in separate containers.
- h. Incompatible waste shall not be placed within ten feet of each other within storage or holding areas. Determinations of incompatibility shall be made in accordance with the requirements of Attachment II-1, *Waste Analysis Plan*.

5. OPERATING RECORD, CONTAINER TRACKING, SECURITY

- a. An Operating Record for waste storage shall be kept and waste containers shall be tracked in accordance with Attachment III-2, *Waste Identification and Tracking Plan*.
- b. In accordance with Attachment III-2, *Waste Identification and Tracking Plan*, all containers shall be labeled with a tracking number prior to entering container storage.
- c. The container treatment and storage areas shall be kept secure in accordance with Attachment II-2, *Site Security Plan*.
- d. If a hazardous waste container shall be discovered to have a missing label, a temporary label shall be provided for that container upon discovery. A permanent label shall be affixed prior to the end of the shift.
 - 1. A temporary label shall contain at a minimum the following:
 - A. hazardous waste designation,
 - B. date and time of discovery, and
 - C. name of individual making the discovery.

6. CONTAINER UNLOADING

- a. Containers of waste shall be offloaded from the transport vehicle and, may be taken to the Mixed Waste Landfill Cell, placed into the Mixed Waste Treatment Building, placed into permitted storage areas, placed into the Mixed Waste Operations Building, or placed into the Mixed Waste Storage Building in accordance with the provisions of this Permit.
- b. To control the movement of waste at the LARW Truck Unloading Facility, only one waste type (LARW, 11e.(2), or Mixed Waste) shall be managed at one time.
- c. At the Mixed Waste Rail and Truck Unloading Dock, the Permittee may manage more than one waste type.

- b. Products that have not contacted the waste (e.g., pallets, plywood, dunnage, metal banding, bracing material, and non-contaminated absorbent materials) which are shipped with waste shall not be considered wastes unless they are classified as wastes by the Permittee or the generator, in accordance with UAC R315-5-1, or are managed as waste in treatment, storage and disposal units.

7. RAIL CAR MANAGEMENT

- a. The Permittee shall manage rail cars on its rail siding, including its spurs. While on the Permittee's-operated spur, the rail cars shall be inspected with samples collected and analyzed according to Attachment II-1, *Waste Analysis Plan*.
- b. Waste accepted at the facility shall not be moved to spurs other than the Permittee's operated spur for management.
- c. Bulk waste may be unloaded from a rail car using an unloading device. Proper management techniques shall be used when operating the unloading device.
- d. Bulk waste that is unloaded from railcars shall be loaded into trucks or into containers. As necessary, trucks or containers shall be cleaned of any residual material resulting from the loading so that waste shall not be released during transport to a management unit. This cleaning shall be accomplished with brooms, shovels, or other tools before the truck, or container, leaves the loading area. Residual material shall be stored with the waste material or managed in accordance with Section 7.g of this plan.
- e. Rail cars may be cleaned in the washdown area by means of a high pressure water washdown or similar procedure.
- f. The washdown water from rail car cleaning shall be collected in the washdown tank or in containers. The Permittee shall determine whether the washdown water and residual wastes from this procedure are hazardous wastes in accordance with UAC R315-5-1.11. Residual material shall be managed in accordance with Section 7.g of this plan.
- g. Solid materials collected during the cleaning operation, if determined to be hazardous waste using UAC R315-5-1.11, shall be placed in containers and managed in accordance with the requirements for generators in UAC R315-5-3.34 until such waste is placed into permitted management.

8. STORAGE PAD CONSTRUCTION, PALLETS, RUNNERS, AND CONTAINMENT

- a. The Mixed Waste Storage Area shall be located as shown in Attachment II-11,

Facility Drawings. Waste containers shall be elevated on pallets or runners to prevent the container from coming in contact with standing water.

- b. If a spill or leak from a container is discovered, the container shall be replaced or repaired and the spilled or leaked material recovered. Following this corrective action, the storage area may be washed down as needed.
- c. Containment devices such as a plastic liner or plywood may be used during the decontamination, emptying, or transferring of waste from a container or rail car.

9. AISLE SPACING AND STACKING

- a. A row of containers may be up to two pallets or two boxes wide. Rows of containers in storage shall have at least 30 inches of aisle space between containers in neighboring rows. Aisles shall provide access to every container and shall be free from obstruction.
 - i. If, after placement of containers into storage, an aisle between container rows is discovered to be less than 30 inches, the Permittee shall adjust the spacing to provide at least 30 inches of aisle space within 24 hours of discovery.
- b. Containers shall not be stacked above the height limits described in Condition III.F.8.

10. CONTAINER MOVEMENT AND MANAGEMENT

- a. Containers shall be moved by means of a forklift, dump truck, trailer or similar equipment. Proper techniques shall be used for equipment operation.
- b. Container movement shall be limited to movement of one level at a time (e.g., pallets with containers and B-25 boxes shall not be stacked during movement).
- c. Movement of containers shall be performed only after it has been assured that the containers are in a closed condition, except for situations listed in Section 10.d of this plan.
- d. If uncontainerized waste is to be moved, the following conditions shall apply:
 - i. the waste shall only be moved within the Mixed Waste Treatment Building, or the Mixed Waste Storage Building, or
 - ii. the waste shall be secured within or upon a vehicle to prevent shifting,

spilling, or release to the environment.

- e. Containers shall be transported as close to the ground as practical to minimize the distance a container might fall in the event of an accident.

11. LIQUID WASTE MANAGEMENT

- a. Wastes with liquid components shall be managed in containers only in the Mixed Waste Treatment Building, or the Mixed Waste Operations Building, or the Mixed Waste Storage Building, or on portable secondarily-contained pallets, or as outlined in accordance with the applicable provisions of this permit.
- b. Waste with a liquid component shall be managed in accordance with the requirements of Attachment II-1-4, *Liquid Waste Management Plan*.
- c. On-site generated liquid waste shall be managed in accordance with Attachment II-1-6, *Leachate, Evaporation, and Decontamination Waste Management Plan*.
- d. Waste with a liquid component and which requires other treatment shall be managed in accordance with the applicable provisions of Attachment II-1-3, *Waste Stabilization Plan*.

12. ADDITIONAL REQUIREMENTS FOR MACROENCAPSULATION

- a. MACRO Capsules
 - i. MACRO Capsules shall be handled using equipment designed to be used with the MACRO Capsules.
 - ii. MACRO Capsules shall be stored on specially designed pallets.
 - iii. MACRO Capsules in storage shall not be stacked.
 - iv. MACRO Capsules shall be stored in rows of not more than four wide.
- b. LDPE MACRO Forms
 - i. If a MACRO Form is found in storage that does not meet the acceptance criteria of Attachment II-1-5, *Macroencapsulation Plan*, the Permittee shall follow the Corrective Action Requirements outlined in Attachment II-1-5, *Macroencapsulation Plan*.

Other Requirements for Macroencapsulation (MACRO) are provided in Attachment II-1-

5, Macroencapsulation Plan.

13. ADDITIONAL REQUIREMENTS FOR MICROENCAPSULATION

Requirements for Microencapsulation (MICRO) are provided in Attachment II-1-8,
Microencapsulation Plan.

END OF ATTACHMENT III-1